

Exhibit 10

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August 23, 2024

Via E-mail

Ian Eppler
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**Re: Johnson & Johnson Health Care Systems Inc. v. Save On SP,
LLC (Case No. 2:22-cv-02632-JKS-CLW)**

Dear Ian,

We write in response to your August 9, 2024 letter regarding J&J's Thirteenth Requests for Production.

Request No. 124. During our July 23, 2024 meet-and-confer, we asked you to explain the relevance of this Request, which seeks documents related to "adaptations to the SaveOnSP Program undertaken for the purpose of complying with any state's Any Willing Provider Law or any state's Anti-Steering Law." You stated that J&J had previously understood Accredo to be the only pharmacy with which SaveOn worked, and that this request was aimed at understanding instances in which SaveOn worked with non-Accredo pharmacies.

J&J has been aware for over a year that SaveOn works with pharmacies other than Accredo. The data we produced in May and June 2023 contains the pharmacy for every transaction in which a patient on a SaveOn-advised plan filled a Janssen drug. *See* May 5, 2023 Ltr. from E. Snow to H. Sandick; June 2, 2023 Ltr. from E. Snow to H. Sandick.

 *See* Sept. 20, 2023 Ltr. from M. Nelson to C. Deskus at 4. We thus do not agree that

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J&J requires additional discovery to understand why and when SaveOn worked with non-Accredo pharmacies.

J&J's new search term proposal would require SaveOn to review 4,430 documents, which is unduly burdensome given the marginal relevance of this Request. The term-by-term hit counts for J&J's narrowed search term proposal are contained in Appendix 1 to this letter.

Request No. 125. During our meet-and-confer, we stated that we would investigate whether SaveOn possesses any relevant documents responsive to this Request. Based on our investigation, we understand that in the summer of 2023, several biosimilars to Humira, an AbbVie drug, came to market. We understand that the only documents which SaveOn possesses which may be responsive to this Request relate exclusively to Humira, which is not a Janssen drugs, and thus are irrelevant. SaveOn declines to produce them.

Request Nos. 126 and 127. During our meet-and-confer, we asked you to explain the relevance of this Request, which seeks personnel files and employment records for Ayesha Zulqarnain, Alissa Langley, Kelsey Leger, and Jessica Johnson. You stated that the files are relevant because they may contain information about these individuals' participation in alleged efforts to deceive manufacturers. We have reviewed the files and represent that they do not contain any information regarding attempts to deceive or evade detection by manufacturers.¹ SaveOn declines to produce them.

Request Nos. 128 and 129. As we explained in our Responses and Objections and repeated in the parties' meet-and-confer, our position is that all relevant documents responsive to these requests are already being produced. J&J's search term proposal is not tailored to identify relevant material that would not have been identified by existing search terms; it rather assumes that every document related to these the Enterprise Steering Committee and the Monthly Sales Team Discussion is relevant. We disagree. If you believe that there specific relevant topics that these groups may have considered that are not covered by existing search terms, please propose search terms limited to those topics and we will consider them.

¹ During our call, your colleague suggested that these files might nevertheless be relevant because the lack of information about purported evasion could suggest that SaveOn condoned such activities. We disagree.

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We are available to meet and confer.

Sincerely,

/s/ Matthew Nussbaum

Matthew Nussbaum
Associate

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Appendix 1

Terms	Documents with Hits	Documents with Hits + Family	Total Additional Documents to Review
("Specialty Precision" OR "Precision Specialty") W/25 (law OR legis* OR regulat* OR complian* OR ban* OR prohib* OR restri* OR respons* OR respond*)	2,652	6,860	1,900
T(("Any Willing Provider" OR AWP OR "Anti-Steering" OR "Anti-Steerage") OR (exclusiv* W/3 specialty)) W/25 (law OR legis* OR regulat* OR complian* OR ban* OR prohib* OR restri* OR respons* OR respond*)	5,576	15,402	4,035
<i>Total for both terms</i>	6,189	16,146	4,430